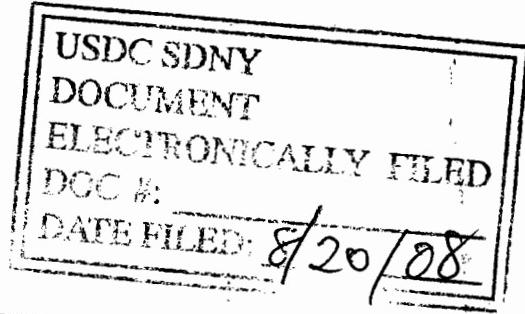


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Attorneys for Plaintiffs

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 1 World Trade Center LLC
 2 World Trade Center LLC
 3 World Trade Center LLC
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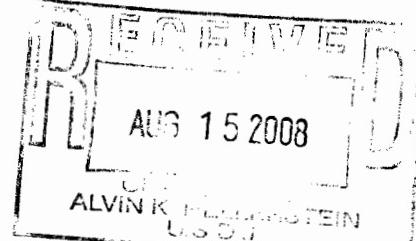
- and -

Attorneys for the Following Fourteen
 Non-Parties Served With Subpoenas:

Stanley Chera
 Jane Goldman
 Katja Goldman
 Dorian Goldman
 Lloyd Goldman
 Emzon Shung
 Michael Sonnenfeldt
 Friedman LLP
 Silverstein East WTC Facility Manager LLC
 Silverstein WTC LLC
 Silverstein WTC Properties LLC
 WTC Management and Development LLC
 WTC Investors LLC
 BLDG Management Company Inc.

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

IN RE SEPTEMBER 11 PROPERTY DAMAGE
 AND BUSINESS LOSS LITIGATION



The discovery complained of
 will be regulated at the conclusion
 of argument on the Aviation Def't's
 motion for summary judgment.
 The motion for protective
 order, therefore, is denied, except
 prejudice to renewal after
 such regulation.

8/20/08
 Alvin K. Silverstein

x 21 MC 101 (AKH)

**NOTICE OF MOTION FOR
 PROTECTIVE ORDER**

This document also relates to:
 08 CIV 3719
 08 CIV 3722

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support
 of Motion for Protective Order Granting a Temporary Stay of Discovery as to Fourteen
 Subpoenas Issued to Non-Parties Concerning the WTCP Plaintiffs' Damages Claims, and the

annexed Declaration in Support of Motion for Protective Order Granting a Temporary Stay of Discovery as to Fourteen Subpoenas Issued to Non-Parties Concerning the WTCP Plaintiffs' Damages Claims, executed August 14, 2008 by Jason T. Cohen, and upon all prior pleadings and proceedings had herein, Plaintiffs World Trade Center Properties LLC, 1 World Trade Center LLC, 2 World Trade Center LLC, 3 World Trade Center LLC, and 4 World Trade Center LLC, and non-parties Stanley Chera, Jane Goldman, Katja Goldman, Dorian Goldman, Lloyd Goldman, Emzon Shung, Michael Sonnenfeldt, Friedman LLP, Silverstein East WTC Facility Manager LLC, Silverstein WTC LLC, Silverstein WTC Properties LLC, WTC Management and Development LLC, WTC Investors LLC and BLDG Management Company Inc., by their attorneys, Flemming Zulack Williamson Zauderer LLP, will move this Court for an Order, pursuant to Fed. R. Civ. P. 26(c), temporarily staying discovery of the following non-parties which the Aviation Defendants have subpoenaed for depositions and/or document productions concerning the WTCP Plaintiffs' damages claims:

Stanley Chera,
Jane Goldman,
Katja Goldman,
Dorian Goldman,
Lloyd Goldman,
Emzon Shung,
Michael Sonnenfeldt,
Friedman LLP,
Silverstein East WTC Facility Manager LLC,
Silverstein WTC LLC,
Silverstein WTC Properties LLC,
WTC Management and Development LLC,
WTC Investors LLC, and
BLDG Management Company Inc.

A temporary stay is sought until such time as this Court issues an Order disposing of the Aviation Defendants' Motion for Summary Judgment as to the WTCP Plaintiffs' damages claims with respect to WTC 1, 2, 3 (formerly known as 5) and 4.

Pursuant to Local Civil Rule 6.1(b), opposing affidavits or memoranda of law, if any, shall be served within ten business days after the service of these moving papers, and any reply affidavits or memoranda of law shall be served within five business days after the service of such answering papers. Pursuant to Local Civil Rule 6.1(c) and to Rule 2(D) of the Individual Rules of the Honorable Alvin K. Hellerstein, no oral argument shall be had on this cross-motion unless directed by further order of this Court.

Dated: August 14, 2008
New York, New York

FLEMMING ZULACK WILLIAMSON
ZAUDERER LLP

By:

Jason T. Cohen, Esq.

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2 World Trade Center LLC
3 World Trade Center LLC
4 World Trade Center LLC

- and -

Attorneys for the Following Fourteen Non-
Parties Served With Subpoenas:

Stanley Chera
Jane Goldman
Katja Goldman
Dorian Goldman
Lloyd Goldman
Emzon Shung
Michael Sonnenfeldt

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